

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:

## All Suits Against the Saint Thomas Entities

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

## **SAINT THOMAS ENTITIES' DISCLOSURE OF EXPERT WITNESSES**

The Saint Thomas Entities<sup>1</sup> hereby make these expert disclosures as required by Federal Rule of Civil Procedure 26(a)(2). Reports in compliance with Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure are attached hereto.

### A. IDENTITY OF EXPERTS AND INFORMATION FROM RETAINED EXPERTS

The following persons are those whom the Saint Thomas Entities have retained to date to provide expert testimony on common issues. The Saint Thomas Entities may use the following persons at trial to present evidence under Federal Rule of Evidence 702, 703, 704 and/or 705:

Retained Experts:

1. Keith H. St. John, MT(ASCP), MS, CIC  
220 Juniper Road  
Newark, Delaware 19711  
(302) 547-1447
2. David S. Joseph, R.Ph., FIACP  
4712 Grainary Ave.  
Tampa, Florida 33624  
(813) 240-8110

<sup>1</sup>Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

3. Robert Parrino, Ph.D., CFA  
210 Lavaca Street, Unit 2501  
Austin, Texas 78701  
(512) 569-0120
4. Brian C. Reisetter, RPh, MBA, Ph.D.  
1200 Jefferson Avenue  
Suite 200  
Oxford, Mississippi 38655  
(662) 281-0502
5. Raymond K. Schneider, P.E.  
149 Limestone Springs  
Pickens, South Carolina 29671  
(864) 878-3238
6. Ian M. Wallis  
50 Bromfield Street  
Newburyport, Massachusetts 01950  
(978) 270-9882

The Saint Thomas Entities attach a written report for each retained expert. Each report is prepared and signed by the expert and contains the information required by 26(a)(2)(B), if applicable. All opinions expressed are based on each witness's education, training and experience.

#### **B. INFORMATION FROM NON-RETAINED EXPERTS**

The following persons are those who are not required to provide a written report:

1. Philip J. Austin, Ph.D.  
11844 Brookfield  
Livonia, MI 48150

Pursuant to Federal Rule 26(a)(2)(C), the Saint Thomas Entities attach Dr. Austin's report, previously produced by the PSC. They also incorporate by reference any opinions expressed by Dr. Austin at his deposition.

The Saint Thomas Entities reserve the right to supplement the reports and/or opinions of the aforementioned experts based on any additional information that may be produced by any party to this lawsuit or any non-party and/or in response to opinions provided by other parties' experts.

They further reserve the right to designate additional rebuttal experts and reports, or offer additional opinions from designated experts, as a result of other parties' expert disclosures or deposition or trial testimony.

They further reserve the right to supplement their reports in response to pending depositions (e.g., Joe Connolly and John Notarianni) or any future depositions permitted by the Court.

The Saint Thomas Entities hereby cross-designate any expert disclosed by any other party, and reserve the right to call such witness to trial regardless of whether such witness is later de-designated or otherwise attempts not to participate at trial.

Dated: December 16, 2015

SAINT THOMAS WEST HOSPITAL F/K/A  
ST. THOMAS HOSPITAL, SAINT THOMAS  
HEALTH, AND SAINT THOMAS  
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By their attorneys,

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**CERTIFICATE OF SERVICE**

I certify that this document was served electronically by e-mail to the following on the 16<sup>th</sup> day of December, 2015.

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/s/ Adam Schramek

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